

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA,

Plaintiff

v.

KYLE GERALD PRALL

Defendant

§
§
§
§
§
§
§
§
§

Crim. No. A:19-CR-013 RP

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE
ALLOWING DEFENDANT TO MOVE TO ILLINOIS

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes Kyle Gerald Prall (the “Defendant”), through his attorney of record, and requests that the conditions of release without bond, as prescribed by this Court’s Order of January 16, 2019 (Doc. No. 11), be modified under the following terms and conditions:

1. Defendant’s family, including his newborn, is moving to Illinois to be closer to other family members and to assist with his child’s care in light of the circumstances presented by this matter.
2. Defendant requests that the terms of his pre-trial release be modified to allow him to move with his family, and his newborn, to Illinois. If granted, the Defendant will reside there, but will appear in this court for all necessary future hearings.
3. Mr. Prall has demonstrated that he is not a flight risk and has been compliant with the terms of his existing order. His pretrial officer has indicated support for the request made herein.
4. Undersigned counsel has discussed this matter with counsel for the government. The government has stated that it is unopposed to modifying the conditions of his release to allow the Defendant to move with his family. The Defendant is currently in compliance with the terms of his pre-trial release.

THEREFORE, premises considered, the undersigned attorney prays that Defendant’s motion be granted to modify the conditions of his pre-trial release to allow him to move with his family to Illinois.

Respectfully submitted,

By: /s/ Jason Freeman
Jason B. Freeman
TX Bar # 24069736
Freeman Law, PLLC
2595 Dallas Parkway, Suite 420
Frisco, Texas 75034
Telephone: 214.984.3410
Fax: 214.984.3409
Jason@freemanlaw-llc.com

ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of May, 2019, I have electronically filed the foregoing document with the Clerk of Court through the CM/ECF document filing system, which sent notification and copies of the filing to all counsel of record.

/s/ Jason B. Freeman
Jason B. Freeman

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA,

Plaintiff

v.

KYLE GERALD PRALL

Defendant

§
§
§
§
§
§
§
§
§

Crim. No. A:19-CR-013 RP

ORDER GRANTING
UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE
ALLOWING DEFENDANT TO MOVE TO ILLINOIS

ON THIS DAY came to be heard this Motion to Modify Conditions of Release allowing **KYLE GERALD PRALL** to move to Illinois. The Court, having reviewed the documents on file and the unopposed motion set forth by counsel for the Defendant, is of the opinion that the Motion is proper and should be GRANTED.

The Defendant is allowed to move to Illinois with his family, with the permission of this Court, and under the guidelines and conditions set forth by Defendant's Pre-Trial Services officer.

IT IS THEREFORE ORDERED that Defendant's Motion shall be, and is hereby, **GRANTED**.

SIGNED this _____ day of _____ 2019.

United States District Judge